

EXHIBIT “1”

the World Trade Center Captive Insurance Company, Inc. relating to the September 11th Consolidated Cases.

- *Deepwater Horizon Litigation*, MDL 2179 (E.D. La.), where I served as the Trustee of the Medical Benefits Settlement and, as Claims Administrator, designed and implemented a 21-year periodic medical evaluation program that involved over 22,000 eligible class members entitled to claim compensation and/or medical consultation services.

- *National Football League Players' Concussion Injury Litigation*, MDL 2323 (E.D. Pa.), where I designed and implemented a medical evaluation program comprised of a national network of medical service providers who provided baseline assessments of neurocognitive function and follow-up care for an estimated 17,000 players over 10+ years.

- *Vioxx Product Liability Litigation*, MDL Docket No. 1657 (E.D. La.), where I served as the Lien Resolution Administrator tasked with resolving health care reimbursement claims (or “liens”) asserted against over 10,000 claimants by Centers for Medicare & Medicaid Services (“CMS”), all 53 state and territory Medicaid agencies; and several other governmental healthcare payers, such as the Veterans Affairs, TRICARE, and Indian Health Services.

- *In re Flint Water Cases*, 5:16-cv-10444 (E.D. Mich.), where I was appointed in February 2023 to bring our unique claim adjudication and allocation technology, claims adjudication skills, and processing knowledge to bolster the existing administration framework in *In re Flint Water Case*.

- *In re 3M Combat Arms Earplug Products Liability Litigation*, MDL Docket No. 2885 (N.D. FL), where I was appointed as Allocation Special Master to design and oversee the allocation methodology to calculate settlement awards to over 250,000 eligible claimants.

- *City of Camden, et al. v. E.I. du Pont de Nemours and Company (n/k/a EIDP, Inc.), et al.*, Case No. 2:23-cv-03230 and in the case of *City of Camden vs. 3M Company*, Case No. 2:23-cv-03147, where I was appointed to serve as Special Master in two related cases filed in the Aqueous Film-Forming Foams Multi-District Litigation (the “AFFF MDL,” Case No. 2:18-mn-2873) –Both cases involve settlement agreements with the 3M and DuPont defendants to resolve the claims of public water systems who allege harm to their drinking water from PFAS.

4. Pursuant to these appointments and engagements, I have been responsible (either personally or through organizations I have led) for designing and overseeing efforts to notify class members/claimants of a proposed settlement; to process claims for compensation (including award allocation); to monitor or assess later manifesting conditions (i.e., “medical monitoring”); to resolve the claimants’ or class members’ healthcare liens (such as those asserted by Medicare, Medicaid, and other governmental agencies and/or private health insurance providers); to hear requests for reconsideration, recalculation, or appeal of settlement awards; to disburse settlement funds; to manage the assets of settlement trusts (including serving personally as trustee); to maintain and manage claimant/class member education and outreach centers; to provide reports to courts overseeing settlements; to assist the parties in resolving disputes (consistent with the settlement agreements in those matters); to oversee supplemental funds related to base settlement awards (i.e. extraordinary injury funds, extraordinary compensation funds, special needs funds), and to interact with counsel, the relevant court, and/or a settlement program’s oversight body.

5. I am experienced with innovative technology that has made the review and adjudication of proof of claims at scale more efficient than ever before. Specifically, in recent settlements, I have successfully implemented platforms which utilize the power of clinical linguistics, artificial intelligence, and machine learning to improve the accuracy and speed of the

claim adjudication process. In the simplest terms, this means that Special Masters and Claim Administrators can now operate a guided review process with a system that can automate analysis of records and data to identify proof of exposure and damages quickly and objectively in the records and route that information automatically to the methodology or system that calculates compensation.

6. I have reviewed the Personal Injury Master Settlement Agreement in the above captioned matter, dated May 9, 2024.

7. I declare that I am experienced, qualified, and ready to serve as Allocation Special Master to create an Allocation Methodology to calculate Settlement Awards for each Eligible Claimant who becomes a Registered Claimant in the Personal Injury Settlement Program, to review and approve the Settlement Administrator's application of this Allocation Methodology and resulting Settlement Awards, and to provide quasi-judicial intervention if and/or when necessary as contemplated in the administration of the proposed Settlement.

8. I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 9, 2024, in Park City, UT.

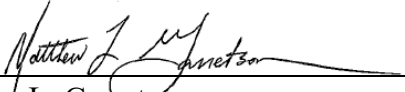

Matthew L. Garretson

Exhibit A

Garretson, LLC provides design, administration and oversight of complex operations in settlement programs related to individuals or businesses that experience a catastrophic event. Our services help stakeholders in such programs achieve controlled, predictable outcomes. Relevant experience in select high profile matters:



PG&E Fire Victim Trust (Docket No. 8053, Confirmed by United States Bankruptcy Court, Northern District of California)



Equifax Inc. Customer Data Security Breach Litigation (MDL Docket 2800, United States District Court, Northern District of Georgia)



World Trade Center Disaster Site Litigation (MDL Docket MC100, MC102 and MC103, United States District Court, Southern District of New York)



Deepwater Horizon Litigation (MDL 2179, United States District Court, Eastern District Louisiana)



National Football League Players' Concussion Injury Litigation (MDL 2323, United States District Court, Eastern District of Pennsylvania).



Archdiocese of Louisville (In re: Roman Catholic Bishop of Louisville, Inc., Jefferson Circuit Court, Louisville, Kentucky).



Archdiocese of Cincinnati Claims Restitution Fund



Cincinnati Policing (Case No. C-1-99-3170, United States District Court, Southern District of Ohio)



Zyprexa Products Liability Litigation (MDL 1596, United States District Court, Eastern District of New York)



Vioxx Products Liability Litigation (MDL 1657, United States District Court, Eastern District of Louisiana)



Pelvic Repair System Products Liability Litigation [a/k/a Transvaginal Mesh] (MDL 2326, United States District Court, Southern District of District of West Virginia)



Avandia Marketing, Sales Practices, and Products Liability Litigation (MDL 1871, United States District Court, Eastern District of Pennsylvania)



Actos Products Liability Litigation (MDL 2299, United States District Court, Western District of Louisiana)



Remington Arms Company (Case No. 4:13-CV-00086-OD (Western District of Missouri))



TK Holdings Inc. (a/k/a Takata Airbags (Case No. 17-11375, United States Bankruptcy Court, District of Delaware))



Anderson Settlement Program (related to plaintiffs who filed claims against the University of Michigan in E.D. of Michigan 2:20-cv-10568).



Strauss Individual Settlement Program (related to plaintiffs who filed claims against The Ohio State University in S.D. Ohio Case No.'s 2:18-cv-00692, 2:18-cv-00736, 2:19-cv-02462).



In re Flint Water Cases, 5:16-cv-10444 (E.D. Mich.)



In re Aqueous Film-Forming Foams Products Liability Litigation



*In re 3M Combat Arms Earplug Products Liability Litigation,
MDL Docket No. 2885 (N.D. FL)*



Matthew Garretson
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Matthew Garretson received a BA from Yale University, a law degree at Kentucky's Salmon P. Chase College of Law and a Masters in Theology from Chicago Theological Seminary.

Garretson has served as the special master or administrator of settlement funds and crisis response programs through the country in environmental disaster, product liability, civil rights, sexual abuse and other cases. In this capacity, Garretson has substantial firsthand experience with the design, administration and/or oversight of hundreds of class action and mass tort resolution programs. Further, he has extensive experience adjudicating and allocating claims as a court-appointed neutral and has modernized the approach to such claims adjudication using the power of clinical linguistics, artificial intelligence and machine learning with Pattern Data (<https://patterndata.ai>).

Garretson is also the author of a legal textbook published by West Publishing entitled "Negotiating and Settling Tort Cases," in addition to several articles regarding professional responsibility in settlements. He is a frequent speaker at Continuing Legal Education seminars regarding lawyers' professional responsibilities in class action and other mass tort matters, including The American Association For Justice, The American Bar Association, The Rand Corporation, DRI and dozens of state attorney associations. Garretson also serves as a member of the Advisory Board for Rand Center for Catastrophic Risk Management and Compensation.

In addition to being the founder Garretson, LLC, Garretson is the co-founder of Signal Interactive Media (www.signalinteractive.com), a firm dedicated to improving the efficacy of class notice through contemporary data analytics and mass media. He is also a founder of BurnBright, LLC (www.BurnBright.com), a firm that provides research, data analytics and technology to create engaging, interactive micro-learning content. Garretson's work with Signal and BurnBright provides him unique insights into creating relevant learning experiences to increase claimant/class member engagement with and participation in settlement or crisis response programs.

He is also the co-Founder and former CEO of The Garretson Resolution Group, Inc ("GRG"), which provides lien resolution and complex settlement administration services in mass torts. In 2018, Garretson led the sale of GRG to Epiq, a worldwide provider of legal services.

When he is not designing or overseeing settlement programs, Garretson spends his time pouring into BurnBright Institute (“BBI”). BBI provides learning management systems for innovators and leaders of non-profit organizations operating in the Dominican Republic, Haiti and Mexico with an emphasis on improving the well being of vulnerable youth, their families and their communities.

Speaking Engagements (re: Aggregate Settlements, Legal Ethics & Professional Responsibility)

- AAJ Annual Meeting ‘03, ‘06, ‘08
- AAJ Hormone Therapy ‘04
- AAJ Mid-Winter ‘05, ‘06
- AAJ Weekend with the Stars ‘06
- AAJ Nursing Home Litigation Seminar ‘08
- AAJ Ski Medical Seminar ‘08
- AAJ Winter Convention ‘08, ‘13
- AAJ MSP Teleseminar ‘12
- American Bar Association Annual Convention ‘15
- Catholic Health Initiatives ‘08
- Colorado Trial Lawyers Association Winter Convention ‘09, ‘12
- Connecticut Trial Lawyers Association ‘09
- Consumer Attorneys of California ‘01, ‘03, ‘04, ‘06, ‘09
- Consumer Attorneys of Sonoma County ‘01
- DRI Annual Meeting ‘07
- DRI Mass Torts MSP Webcast ‘13
- Duke Law Center for Judicial Studies ‘16
- Federal Trade Commission, Class Action Notice Workshop ‘19
- Florida Justice Association ‘09
- Georgia Trial Lawyers Association ‘08, ‘09
- George Washington University Law School ‘16
- Hamilton Country Trial Lawyers Association ‘05
- Harris Martin ‘13, ‘15, ‘15, ‘16
- Hormone Replacement Therapy Seminar ‘07
- Indiana Trial Lawyers Association ‘09
- Kansas Trial Lawyers Association ‘03, ‘04, ‘07
- Kentucky Academy of Trial Lawyers ‘06
- Kentucky Justice Association ‘08
- Louisiana State Bar Association Admiralty Symposium ‘07, ‘13, ‘14, ‘15
- Louisiana Bar Mass Tort Symposium ‘02, ‘04
- Louisiana State Bar Assoc. Complex Litigation Symposium ‘13, ‘16
- Louisiana Trial Lawyers Association Annual ‘07
- Mass Torts Made Perfect ‘03, ‘04, ‘06, ‘08, ‘13
- Mass Torts Made Perfect Judicial Forum ‘13
- Mealey’s Lexis/Nexis Art of Negotiation ‘07

- Mealey's Lexis/Nexis Contingency Fees '07
- Mealey's Lexis/Nexis Ethics '07
- Mealey's Lexis/Nexis Client Expenses '06
- Mealey's Lexis/Nexis Emerging Drug and Devices '04
- Mealey's Lexis/Nexis MMSEA '08
- Mealey's Medicare & ERISA Liens: New Developments '09
- Mississippi Trial Lawyers Association '02
- Michigan Negligence Law Section '09
- Michigan Association for Justice '08
- Minnesota Trial Lawyers Association '09
- Montana Trial Lawyers Association '08
- New York Academy of Trial Lawyers '07
- Norfolk and Portsmouth Bar Association '03
- NABIS – Medical Issues in Brain Injury '05, '06, '07
- Ohio Academy of Trial Lawyers Annual '03, '04, '05, '06, '07
- Ohio Academy of Trial Lawyers Subrogation Seminar '06
- Ohio Academy of Trial Lawyers Worker's Compensation '07
- Ohio Association for Justice '08, '09
- Insurance/Negligence Seminar '09
- Ohio State Bar Association Annual Convention '06
- Ohio Trial Advocacy Seminar '04, '06
- Oklahoma Trial Lawyers Association '07
- Perrin Conferences '12, '13
- Philadelphia Assn. for Justice '08
- Plaintiff Asbestos Litigation Seminar '07
- Professionally Speaking Seminar '07
- RAND Corporation '16, '17
- San Antonio Trial Lawyers Association '07
- Society of Settlement Planners '07
- TBI Symposium - Brain Injury Association of Ohio '04, '06
- TPL-COB National Conference '07
- Utah Bar Association Annual Seminar '05
- Utah Trial Lawyers Brain Injury '02, '03, '04, '05, '06, '07
- Utah Trial Lawyers Association Annual Convention '07
- Utah Association for Justice '09
- Virginia Trial Lawyers Association '05

Publications

- Negotiating and Settling Tort Cases, ATLA / West Publishing (2007). Updated 2013, 2015.
- A Fine Line We Walk: Counseling Clients About the “Form” of Settlement, 13 A.B.A. Prof'l Law. 4, 2002.
- Don't Get Trapped By A Settlement Release, Trial Magazine, September 2003.

- A Practical Approach to Proactive Client-Counseling and Avoiding Conflicts of Interest in Aggregate Settlements, The Loyola University Journal of Public Interest Law, Volume 6, 2004.
- Deferring Attorney Fees: Is There Now a Critical Mass of Enabling Legislation? Ohio Trial, Volume 14, Issue 2, 2005.
- Making Sense of Medicare Set-Asides, Trial Magazine, May 2006.
- What Does the Ahlborn Decision Really Mean? Ohio Trial, Fall 2006.
- Medicare's Reimbursement Claim - The Only Constant is Change, Ohio Trial, Spring 2007.
- One More Thing to Worry About in Your Settlements: The Medicare, Medicaid and SCHIP Extension Act of 2007, Philadelphia Trial Lawyers Association Verdict, Volume 2007, Issue 6.
- Act II – Reporting Obligations for Settling Insurers where Medicare is a Secondary Payer: The Medicare, Medicaid and SCHIP Extension Act of 2007, May 18, 2009.
- Easing Health Care Lien Resolution, AAJ Trial Magazine, October 2010.
- The Medicare, Medicaid and SCHIP Extension Act of 2007, Section 111 Reporting: One More Thing to Worry About in Your Settlements, March 2012.
- The SMART Act: How a New Federal Law Could Fast Track Your Settlements, 2013.